

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

**IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION**

Case No. CIV-16-209-M

**MICHELLE WHITE,
on behalf of herself
and all others similarly situated,**

Plaintiff,

v.

Case No. CIV-16-351-M

**CHESAPEAKE ENERGY CORP.,
CHESAPEAKE EXPLORATION, LLC,
as a successor by merger to
CHESAPEAKE ENERGY
EXPLORATION, L.P.,
SANDRIDGE ENERGY, INC.,
TOM L. WARD, and
JOHN DOES 1-50,**

Defendants.

**PLAINTIFF MICHELLE WHITE'S MOTION FOR ORDER SETTING A
BRIEFING SCHEDULE FOR MOTIONS FOR APPOINTMENT OF INTERIM
LEAD COUNSEL AND LIAISON COUNSEL AND EXTENDING TIME FOR
FILING CONSOLIDATED COMPLAINT**

Plaintiff Michelle White respectfully moves this Court for an order setting a briefing schedule for motions for appointment of interim lead counsel and liaison counsel, as well as extending the time for filing a consolidated complaint.

On April 13, 2016, Plaintiff White filed her class action complaint in this matter. On the same day, Plaintiffs Brian Thieme; Don Beadles I/T/F the Alva Synagogue Church of God; Janet Lowry; Garvin Holdings, LLC; The Ruby L. Stucky Trust Dated April 22,

1997; Ida Powers and Larry Powers; Curtis L. Crandall and Janet K. Crandall; Catherine Jaunita Behrenbrinker; and Derrick R. Herzog and Amy K. Herzog, filed a motion entitled “Plaintiffs’ Agreed Motion for Appointment of Burns Charest LLP, Susman Godfrey LLP, and Cohen Milstein Sellers & Toll PLLC as Interim Co-Lead Counsel and Mitchell DeClerck PLLC as Liaison Counsel.” ECF No. 36 (“Thieme Lead Counsel Motion”). The motion states that all Plaintiffs captioned in the motion agreed to those appointments. *Id.*

However, Plaintiff White was not asked whether she agreed with the Thieme Lead Counsel Motion and, in fact, does not support that motion. Similarly, Plaintiffs Mahony-Killian, Inc.; Edward Clark, Inc.; and Cynthia Ann Schoepel (collectively referred to as “Mahony-Killian Plaintiffs”) were also left out of the motion and on April 19, 2016, filed a motion for an order setting a briefing schedule for motions for appointment of interim lead counsel and liaison counsel, and extending the time for filing a consolidated complaint. ECF No. 53. That motion proposes that motions for appointment of interim lead counsel and liaison counsel be filed by April 26, 2016 and that any reply briefs be filed by May 3, 2016. *Id.* It further proposes that the time to file a consolidated complaint be extended until 14 days after this Court’s order appointing interim lead counsel and liaison counsel. *Id.*

Not all plaintiffs agree on the appointments proposed in the Thieme Lead Counsel Motion. Because there are a number of duplicative and competing suits, a number of lawyers may compete for class counsel appointment. *See Manual for Complex Litig.*, § 21.11, at 246 (4th ed. 2004). It is generally accepted that the same process and standards applicable to choosing class counsel apply in choosing interim lead counsel. *In re Air Cargo Shipping Servs. Antitrust Litig.*, 240 F.R.D. 56, 57 (E.D.N.Y. 2006). A process and briefing schedule are thus necessary to ensure informed and fair selection of interim lead

counsel and liaison counsel. Accordingly, Plaintiff White hereby requests such a briefing schedule and agrees that the dates requested by the Mahony-Killian Plaintiffs are appropriate.

Dated this 21st day of April, 2016.

Respectfully submitted,

s/ Tara Tabatabaie

Tara Tabatabaie, OBA No. 21838

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 21st day of April, 2016, a copy of the foregoing was served via the Court's electronic filing system.

s/ Tara Tabatabaie
Tara Tabatabaie